

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

Architettura, Inc.	)	
Plaintiff	)	
v.	)	
	)	
DSGN Associates Inc.; Robert L.	)	
Meckfessel; Patricia Meckfessel;	)	
Brandon Bolin; McKinney	)	
Millennium LP; McKinney Millennium	)	
GP, LLC; GFD Holdings, LLC;	)	
McKinney Millennium II, LP, McKinney	)	Cause No.: _____
Millennium II GP, LLC; Avondale	)	
Farms Seniors GP, LLC; Avondale	)	
Farms Seniors, LP; GD 2.0 Holdings,	)	
LLC; Benetta Lee Rusk; Rusk Real	)	
Estate, LLC; GroundFloor	)	
Development; Fort Worth Housing	)	
Authority; GD Opportunity I, LLC;	)	
Boston Capital Corporation;	)	
Ellen Rourke; and Texas Department	)	
Of Housing and Community Affairs,	)	
Defendants	)	

**COMPLAINT and JURY DEMAND**

1. Plaintiff, Architettura, Inc., is a Texas corporation with its principal place of business in Plano, Collin County, Texas.
  
2. Defendant **DSGN Associates Inc.** ("DSGN"), is a corporation under the laws of the State of Texas, who can be served by serving his registered agent at 2105 Commerce Street, Suite 300, Dallas, Texas 75201.
  
3. Defendant **Robert L. Meckfessel**, is an individual who can be served at 2105 Commerce Street, Suite 300, Dallas, Texas 75201.

4. Defendant **Patricia Meckfessel**, is an individual who can be served at 2105 Commerce Street, Suite 300, Dallas, Texas 75201
5. Defendant **Brandon Bolin**, is an individual who can be served at 3109 Knox Street, Suite 305, Dallas, Texas 75205.
6. Defendant **McKinney Millennium LP** is a Limited Partnership, who can be served at 3109 Knox Street, Dallas, Texas 75205.
7. Defendant **McKinney Millennium GP, LLC** is a Limited Liability Company, who can be served at 3109 Knox Street, Dallas, Texas 75205.
8. Defendant **GFD Holdings, LLC**, is a Limited Liability Company, who can be served through its registered agent, Brandon Bolin, 3109 Knox Street, Suite 305, Dallas, Texas 75205.
9. Defendant **McKinney Millennium II, LP** is a Limited Partnership, who can be served at 3109 Knox Street, Dallas, Texas 75205.
10. Defendant, **McKinney Millennium II GP, LLC**, a Limited Liability Company, who can be served at 3109 Knox Street, Dallas, Texas 75205.
11. Defendant **Avondale Farms Seniors GP, LLC** is a Limited Liability Company, who can be served through its registered agent, John Shackelford at 9201 N. Central Expressway, 4<sup>th</sup> Floor, Dallas, Texas 75231.
12. Defendant **Avondale Farms Seniors, LP** is a Limited Partnership, who can be served at 8117 Preston Road, West Tower Suit 300, Dallas, Texas 75225.
13. Defendant **GD 2.0 Holdings, LLC** is a Limited Liability Company who can be served through its agent, John Shackelford, 9201 N. Central Expressway, Fourth Floor, Dallas, Texas 75231.

14. Defendant **Benetta Lee Rusk** is an individual who can be served at 5740 Martel Ave, B11, Dallas, Texas 75206.
15. Defendant **Rusk Real Estate, LLC** is a Limited Liability Company, who can be served at 5740 Martel Ave, B11, Dallas, Texas 75206.
16. Defendant **GroundFloor Development** can be served at 8117 Preston Road, West Tower Suite 300, Dallas, Texas 75225.
17. Defendant **Fort Worth Housing Authority** is a Texas entity who may be served C/O Naomi W. Byrne 1201 E 13th St, Fort Worth, TX 76102
18. Defendant **GD Opportunity I, LLC** is a Limited Liability Company, who can be served through its agent, John Shackelford, 9201 N. Central Expressway, Fourth Floor, Dallas, Texas 75231.
19. Defendant **Boston Capital Corporation**, is a Foreign Limited Liability Company, who can be served through its registered agent, National Registered Agents, Inc., 1999 Bryan St., Suite 900, Dallas, Texas 75201.
20. Defendant **Ellen Rourke** is an individual who can be served at 6611 Hillcrest Ave #304 Dallas, Texas 75205.
21. Defendant **Texas Department of Housing and Community Affairs** is a Texas entity who can be served C/O Tim Irvine, Executive Director, who can be served at 221 East 11<sup>th</sup> Street, Austin, Texas 78701-2410.
22. Jurisdiction is proper under 28 U.S.C. 1338.
23. Venue is proper under 28 U.S.C. 1391 (b).
24. Plaintiff is the owner of multiple architectural works. It has obtained registration for a portion of the works and has applied for registration for the remainder of the works.

25. Attachments (Exhibits a - q) are copies of plaintiff's registrations and applications for registration.
26. For convenience defendants are divided into three groups. The Group "A" defendants have used the copyrighted works to create structures. The Group "B" defendants are enjoying the benefits of the protected works through their unpermitted usage of the works. Group "B" is further divided into three subgroups. These subgroups represent owners of three different building projects. The Group "C" defendants have engaged in miscellaneous acts of infringement.
27. The Group "A" defendants are Robert Meckfessel, Patricia Meckfessel, DSGN Associates, and Brandon Bolin, each of these defendants had the opportunity to view, copy and produce the protected work.
28. The Group B 1 are the owners of the "Millennium" project and include, McKinney Millennium, LP; McKinney Millennium GP, LLC; and GFD Holdings, LLC. The "Millennium" is located in McKinney, Texas. Each of these owners are receiving the benefits from the infringing works.
29. The Group B 2 are owners of the "Post Oak Apartments" project and include, McKinney Millennium II, LP; McKinney Millennium II GP, LLC and GFD Holdings, LLC. The "Post Oak Apartments" is located in McKinney, Texas. Each of these owners are receiving the benefits from the infringing works.
30. The Group B 3 are the owners of "Avondale Farms Seniors Development" which is owned by Avondale Farms Seniors GP, LLC; Avondale Farms Seniors, LP; GD 2.0 Holdings, LLC.; GD Opportunity I, LLC; Boston Capital Corporation; Benetta Lee Rusk; Rusk Real Estate, LLC; GroundFloor Development; and Fort

Worth Housing Authority. Each of these owners are receiving the benefits from the infringing works.

31. The Group C defendants having engaged in miscellaneous acts of infringement, regarding Avondale Farm Seniors Development; the Texas Department of Housing and Community Affairs, which copied the protected work and benefited, Ellen Rourke who benefited from its use.

32. All defendants had access to plaintiff's original works, copied same and created and or used works which are identical or substantially similar to the protected works. All defendants are benefiting from the unpermitted use of plaintiffs protected work.

33. All defendants are liable for infringement under the copyright laws of the United States.

JURY DEMAND

34. Plaintiff demands a jury.

PRAYER

35. Plaintiff seeks a judgment for damages, statutory damages, attorneys' fees and such interest as may be permitted by law.

Respectfully submitted,

/s/ Mark J. Zimmermann  
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